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Plaintiff(s), pro se

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Trevor Reid,	Case No.
Crystale Reason	<b>CV-22-00068-PHX-SMB</b>
Plaintiffs	
v.	
United States of America, et al	PLAINTIFFS' NOTICE OF
Defendants	TYPOGRAPHICAL
	CORRECTIONS
	AND
	SUPPLEMENTAL POINTS
	AND AUTHORITIES

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On December 23rd, 2022 Plaintiffs, Trevor Reid and Crystale Reason, filed their Response to United States' Partial Motion to Dismiss Amended Complaint Pursuant To 12(b)(1) (Doc. 36, hereafter the Response). After filing, Plaintiffs recognized typographical errors and omissions in the Response. For clarity, Plaintiffs provide this notice with attached Exhibit A,

a corrected copy of the Response<sup>1</sup>, and Exhibit B, showing differences between the Response and Exhibit A by striking through text that was deleted and underlining text that was added.

Additionally, Plaintiffs supply the following points and authorities that were inadvertently omitted from their Response.

### SUPPLEMENTAL POINTS AND AUTHORITIES

Regarding the assertion that some of Plaintiffs' claims were not administratively exhausted, the FTCA's "section 2675(a) requires the claimant or his legal representative to file (1) a written statement sufficiently describing the injury to enable the agency to begin its own investigation, and (2) a sum certain damages claim." *Warren v. U.S. Dep't of the Interior Bureau of Land Mgmt*, 724 F.2d 776, 780 (9th Cir. 1984). Here, Plaintiffs have satisfied both these conditions. Importantly, it is for the agency to investigate the injury. Claimants are not required to spell out every potential cause of action. Plaintiffs provided the agency much more than the skeletal facts necessary to begin an investigation. The SF95 submitted by each plaintiff also specified a sum certain.

Respectfully submitted this 26th day of December, 2022.

s/ Trevor Reid      s/ Crystale Reason *plaintiffs pro se*

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<sup>1</sup> Page 6, which contained only certification of service, is intentionally omitted from the Exhibits.

**CERTIFICATE OF SERVICE**

I certify that on December 26th, 2022 this filing was provided via  
CM/ECF or mail to:

Noel C. Capps  
Assistant U.S. Attorney  
Two Renaissance Square  
40 North Central Avenue, Suite 1800  
Phoenix, Arizona 85004-4449

Attorney for Defendant the United States of America

s/Crystale Reason